

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

MAIL PROCESSING NETWORK
RATIONALIZATION SERVICE CHANGES, 2012

DOCKET No. N2012-1

**INSTITUTIONAL RESPONSES OF UNITED STATES POSTAL SERVICE TO
AMERICAN POSTAL WORKERS UNION, AFL-CIO INTERROGATORIES,
REDIRECTED FROM WITNESS MARTIN (APWU/USPS-T6-3-4)**

The United States Postal Service hereby provides institutional responses to the above-listed interrogatories of the American Postal Workers Union (APWU), AFL-CIO, dated February 23, 2012, redirected from Witness Martin (USPS-T-6). Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE
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**INSTITUTIONAL RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO AMERICAN POSTAL WORKERS UNION, AFL-CIO INTERROGATORY,
REDIRECTED FROM WITNESS MARTIN**

APWU/USPS-T6-3. What are the operating rules on the co-loading of different classes of mail on transportation among the network plants?

- a) Can and do sub-categories of parcel mail get co-loaded at any given time in the network?
- b) Specifically, are other sub-categories of parcels co-loaded in the current operations with FCM parcels?
- c) What operating rules exist, if any, for co-loading competitive parcel products with market dominant classes of mail, and specifically the parcel sub-categories of market dominant mail classes?
- d) What percentages of each sub-category of parcels are co-loaded in the current operations?
- e) Specifically, what percentage of Priority mail parcels is co-loaded with other classes of mail or parcels in the current operations?

RESPONSE:

- (a) Yes.
- (b) Yes.
- (c) There are no rules related to the co-loading of various products. When the service standards for products are in alignment and transportation capacity is available, co-loading is performed.
- (d) The Postal Service currently does not have such estimates.
- (e) The Postal Service currently does not have such estimates.

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APWU/USPS-T6-4. For those market-dominant classes of mail and specifically the subcategories of parcels for which the testimony says there will be no changes in service standards, will there be changes to CET times for induction of the mail into the network?

RESPONSE:

Interrogatory APWU/USPS-T6-4 does not identify the portion of my testimony or the testimony of another witness upon which the interrogatory is based.

Therefore, only a general response can be provided. The Postal Service does not anticipate changes to the CET times for induction of mail into the network for these products.